

YAKIMA COUNTY, WASHINGTON
January 1, 1994 Through December 31, 1994

Schedule Of Federal Findings

1. County Officials Should Improve Procedures Over Suspended And Debarred Requirements

Our tests of major federal financial assistance programs administered at the Aging and Long-Term Care Department disclosed that officials have not required contractors or subrecipients to provide certifications that they are not suspended or debarred. We also found that county personnel do not review the U.S. General Service Administration's (GSA) current suspension and debarment list to determine that contractors or subrecipients are not on it. This concern was also noted in our 1993 audit report.

The programs tested included U.S. Department of Health and Human Services programs; Special Programs for the Aging - Title III, Part B (CFDA 93.044), Title III, Part C (CFDA 93.045).

The U.S. Office of Management and Budget (OMB) "Common Rule" for *Uniform Administrative Requirements for Grants and Cooperative Agreements with State and Local Governments*, Subpart C.35 states:

Grantees and subgrantees must not make any award or permit any award (subgrant or contract) at any tier to any party which is debarred or suspended or is otherwise excluded from or ineligible for participation in Federal assistance programs under Executive Order 12549, "Debarment and Suspension."

GSA regulations require that recipient of subawards over \$25,000, e.g., contract, subcontract, or subgrant, must certify that the organization and its principals are not suspended or debarred.

Officials have not developed a control structure to provide assurance for compliance with the requirements because there was confusion between departments as to responsibility.

Without the appropriate procedures, federal assistance might be awarded to a suspended or debarred party, which would result in noncompliance with the "Common Rule" requirement.

We recommend that the Aging and Long-Term Care Department review the GSA's Lists of Parties Excluded from Procurement or Nonprocurement Programs prior to granting a contract. County officials should consider if it may be more effective to centralize this review function by assigning the responsibility to one department. We also recommend that the departments obtain required certifications regarding debarment and suspension upon signing contract agreements.